

Michael D. Corey, Esq.
Laura S. Gould, Esq.
Brena, Bell & Walker, P.C.
810 N Street, Suite 100
Anchorage, Alaska 99501
Telephone: (907) 258-2000
E-Mail: mcorey@brenalaw.com
lgould@brenalaw.com

Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

INTERNATIONAL FIDELITY INSURANCE)
COMPANY, a New Jersey corporation, and)
ALLEGHENY CASUALTY COMPANY, a)
New Jersey corporation,)

Plaintiffs,)

v.)

FRED ADKERSON, INC., an Alaska)
corporation, d/b/a FRED'S BAIL BONDING,)
and FRED PARKER ADKERSON,)

Defendants.)

Case No. 3:20-cv-00247-TMB

PLAINTIFFS' COMPLAINT (APPLICATION) FOR
TEMPORARY RESTRAINING ORDER AND FURTHER INJUNCTIVE RELIEF

Plaintiffs, International Fidelity Insurance Company (International) and Allegheny Casualty Company (Allegheny) through their attorneys, Brena, Bell & Walker, P.C., and pursuant to Federal Civil Rule 65, respectfully request that this Court immediately issue a temporary restraining order (TRO) against Defendant Fred Parker Adkerson (Adkerson),

Complaint for TRO and Further Injunctive Relief
International Fidelity and Allegheny Casualty vs. Fred Adkerson, Inc.

October 1, 2020
Page 1 of 2

BRENA, BELL &
WALKER, P.C.
810 N Street, Suite 100
Anchorage, Alaska 99501
Phone: (907) 258-2000
Facsimile: (907) 258-2001

owner of Fred Adkerson, Inc., d/b/a Fred's Bail Bonding (Fred's) to prevent Adkerson from withdrawing any funds from the client collateral account entitled: "Fred P. Adkerson in trust for International Fidelity Insurance Company" (collateral account).¹ Plaintiffs have approximately \$900,000.00 at risk if Adkerson continues to improperly withdraw funds from the collateral account.

Plaintiffs further request that the Court set a hearing for the accompanying complaint for preliminary injunction to require Adkerson to turn over the collateral account to Plaintiffs as contractually required. Plaintiffs similarly have approximately \$900,000.00 at risk if Adkerson continues to refuse to tender control of the collateral account.

This Complaint (Application) is accompanied by the Motion and Memorandum in support thereof, as well as the attached Proposed Order. Plaintiffs are serving Defendants with these documents.

DATED this 1st day of October, 2020.

BRENA, BELL & WALKER, P.C.
Attorneys for Plaintiffs

By


Michael D. Corey, ABA No. 8511130
Laura S. Gould, ABA No. 03310042

BRENA, BELL &
WALKER, P.C.
810 N Street, Suite 100
Anchorage, Alaska 99501
Phone: (907) 258-2000
Facsimile: (907) 258-2001

¹ Exhibit C at 1, attached to the Memorandum in Support of Complaint (Application) for Temporary Restraining Order and Further Injunctive Relief filed herewith.

Complaint for TRO and Further Injunctive Relief
International Fidelity and Allegheny Casualty vs. Fred Adkerson, Inc.

October 1, 2020
Page 2 of 2